

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Sevan Gorginian (SBN 298986) Law Office of Sevan Gorginian 450 N. Brand Boulevard, Suite 600 Glendale, California 91203 Tel: 818.928.4445 Fax: 818.928.4450 Email: sevan@gorginianlaw.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION ▼</p>	
<p>In re:</p> <p>LUSINE CRISTINE DOKUZYAN</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 1:22-bk-10283-MB CHAPTER: 7 ▼</p>
	<p>NOTICE OF MOTION FOR: Debtor's Motion for Protective Order and Opposition to Chapter 7 Trustee's Intention to Release Documents (related to Dkt. No. 18)</p> <p>(Supplement Notice of Zoom Hearing Attached)</p>
	<p>DATE: 08/24/2022 TIME: 11:00 am COURTROOM: 303 PLACE: 21041 Burbank Blvd. Woodland Hills, CA 91367</p>

1. TO (specify name): CHAPTER 7 TRUSTEE, CREDITOR HOVANES TONoyAN AND ALL OTHERS
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 07/12/2022

Sevan Gorginian, Attorney at Law
Printed name of law firm

/s/ Sevan Gorginian
Signature

Sevan Gorginian
Printed name of attorney

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Sevan Gorginian (SBN 298986) Law Office of Sevan Gorginian 450 N. Brand Boulevard, Suite 600 Glendale, California 91203 Tel: 818.928.4445 Fax: 818.928.4450 Email: sevan@gorginianlaw.com <input checked="" type="checkbox"/> <i>Attorney for Movant</i> <input type="checkbox"/> <i>Movant appearing without an attorney</i>	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – SAN FERNANDO VALLEY DIVISION	
In re: LUSINE C. DOKUZYAN Debtor.	CASE NO.: 1:22-bk-10283-MB CHAPTER: 7
	SUPPLEMENTAL NOTICE OF HEARING TO BE HELD REMOTELY USING ZOOMGOV AUDIO AND VIDEO
	HEARING DATE: 08-24-2022 HEARING TIME: 11:00 a.m.
Movant: DEBTOR	

1. The Movant has filed the following written notice or other pleading ("Notice") advising of a hearing to be held in the above-captioned case, on the date and time indicated above, before the Honorable Martin R. Barash, United States Bankruptcy Judge (*insert name of pleading and, if available, docket number*):

Motion for Protective Order and Opposition to Chapter 7 Trustee's Intention to Release Documents

2. Notwithstanding any language in the Notice advising or suggesting that the hearing will be held physically in one of the Court's courtrooms, **please be advised that due to the COVID-19 pandemic, the Court will conduct the hearing remotely, using ZoomGov audio and video technology.** Individuals will not be permitted access to the courtroom. Information on how to participate in the hearing remotely using ZoomGov is provided on the following page of this notice.

3. Hearing participants and members of the public may participate in and/or observe the hearing using ZoomGov, free of charge.
4. Individuals may connect by ZoomGov audio and video using a personal computer (equipped with camera, microphone and speaker), or a handheld mobile device with an integrated camera, microphone and speaker (such as an iPhone, iPad, Android phone or Android tablet). The connection can be initiated by entering the "Meeting URL" into a web browser on any of these devices, provided the device is connected to the Internet. Individuals connecting in this manner will be prompted for the Meeting ID and Password shown below.
5. Individuals also may connect to the hearing by telephone only, using the telephone number provided below. Individuals connecting in this manner also will be prompted for the Meeting ID and Password.
6. Neither a Zoom nor a ZoomGov account is necessary to participate in or observe the hearing, and no pre-registration is required.
7. The audio portion of the hearing will be recorded electronically by the Court and constitute its official record.
8. All persons are strictly prohibited from making any other recording of court proceedings, whether by video, audio, "screenshot," or otherwise. Violation of this prohibition may result in the imposition of monetary and non-monetary sanctions.
9. The following is the unique ZoomGov connection information for the above-referenced hearing:

Video/audio web address: <https://cacb.zoomgov.com/j/1618538265>

ZoomGov meeting number: 161 853 8265

Password: 399246

Telephone conference lines: 1 (669) 254 5252 or 1 (646) 828 7666

10. More information on using ZoomGov to participate in this hearing is available on the Court's website at the following web address: <https://www.cacb.uscourts.gov/news/zoom-video-hearing-guide-and-training-participants>.

Date: 07-12-2022

Sevan Gorginian, Esq.

Printed name of law firm (if applicable)

Sevan Gorginian

Printed name of individual Movant or attorney for Movant

Sevan Gorginian, Esq. (SBN 298986)
Law Office Sevan Gorginian
450 North Brand Boulevard, Suite 600
Glendale, California 91203
Tel: 818.928.4445 | **Fax:** 818.928.4450
Email: sevan@gorginianlaw.com

Counsel for Debtor
Lusine Dokuzyan

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION

In re:
LUSINE CRISTINE DOKUZYAN,

Debtor.

Case No.: 1:22-bk-10283-MB

Chapter 7

**DEBTOR'S OPPOSITION AND MOTION
FOR PROTECTIVE ORDER RE:
CHAPTER 7 TRUSTEE'S INTENTION
TO RELEASE DOCUMENTS [DKT. 18]**

**DECLARATION OF LUSINE
DOKUZYAN FILED IN SUPPORT**

Hearing

Date: August 24, 2022

Time: 11:00 a.m.

Place: Courtroom 303

21041 Burbank Blvd.

Woodland Hills, CA 91367

See Supplemental Notice of Zoom
Hearing Filed Concurrently Herewith

TO HONORABLE MARTIN R. BARASH, U.S. BANKRUPTCY JUDGE;
CHAPTER 7 TRUSTEE AMY GOLDMAN; ALL OTHER PARTIES IN INTEREST:

Lusine Dokuzyan ("Debtor") respectfully asks the Court to enter a protective order with respect to the documents requested by creditor Hovanes Tonoyan ("Creditor") from the Chapter 7 Trustee Amy Goldman ("Trustee"). The Trustee filed a

1 “Notice of Chapter 7 Trustee’s Intention to Release Documents” (“Trustee’s
2 Notice”)[Dkt. 18]. Attached as **Exhibit A** is a copy of the Trustee’s Notice. The
3 Trustee intends to release, at the request of Creditor, copies of bank statements turned
4 over to the Trustee by the Debtor. This Trustee’s Notice was set on “negative notice”
5 and through this Opposition, Debtor requests a hearing be set under LBR9013-1(o)(4),
6 which says if a timely response is received, within 14 days the movant must file a notice
7 of hearing. The Court is asked to set this for hearing on August 24, 2022 at 11:00 a.m.

8 Debtor does not dispute the turnover of the bank statements per se, but merely
9 to redact the identifying characteristics on the bank statements (i.e. transactions and
10 names money was transferred to). The main reason is because Creditor has been
11 extremely aggressive in his efforts to derail the Debtor’s efforts for a fresh start. The
12 Creditor has sent text messages and calls to the Debtor with death threats telling her,
13 Debtor, to go kill herself. Creditor has ruined the Debtor’s physical psyche and has
14 caused Debtor to seek protection. The Creditor has contacted nearly all of the Debtor’s
15 friends and family members to harass them. Creditor is fixated on knowing every
16 intricate of this Debtor’s private life. Creditor sends text messages with varying
17 degrees of threats and outlandish comments. He did so also with Debtor’s counsel.
18 See attached as **Exhibit B** for a copy of these text messages.

19 The Creditor has also been harassing the Chapter 7 Trustee and the Office of the
20 United States Trustee to pursue the Debtor in claims that are unsubstantiated.

21 The history between the Debtor and Creditor stems from a friendship that turned
22 sour and abusive. Between Debtor and Creditor, the Debtor borrowed or took about
23 \$11,000 to pay a debt for a friend, Felipe, on account of a business debt. This
24 completely upset the Creditor and he went on a rampage to ruin her. Debtor filed this
25 Chapter 7 case for the main purpose of discharging the debt owed to him. Creditor
26 went on to disregard the automatic stay by constantly harassing Debtor. Creditor
27 consistently sent lengthy text messages that included statements about Creditor
28 wanting Debtor to die, telling her how she is not safe, and all her money will be gone

defending herself. Through outrage and malice, Creditor filed a baseless adversary proceeding on July 6, 2022, which will be subject to a separate motion to dismiss.

With respect to the documents to be released, i.e. the bank statements, the Debtor begs the Court to allow her, or the Trustee, to redact individual names on the bank statements of whom the Debtor transferred money to or engaged with. Absent that, the Creditor will see these names and contact these individuals in an effort to slander the Debtor and demand payments from these individuals.

The Chapter 7 Trustee has reviewed the names and there exists no cause or basis to pursue any of the people identified in the bank statements. Therefore, the Creditor has no reason to see the names of the people the Debtor transferred money to other than to continue his outlandish quest to ruin this poor girl's life.

Under FRCP 26(c), regarding Protective Orders, the Court has the power to protect a person from annoyance, embarrassment, oppression or undue burden and expense. The Court's protective order will not only help the Debtor but also the individuals and friends of the Debtor identified in the bank statements from considerable harassment by the Creditor. Again, Debtor does not dispute turnover of the bank statements but merely to redact the names identified in the descriptions. This limited redaction is a minor request and will not prejudice the Creditor.

Thus, cause exists to grant this protective request and allow redaction of the description section and names in the bank statements prior to turnover to the Creditor.

Respectfully submitted,

Dated: July 11, 2022

/s/ Sevan Gorginian

Sevan Gorginian, Esq.
Counsel for Debtor

DECLARATION OF LUSINE DOKUZYAN

I, Lusine Dokuzyan, declare as follows:

1. I am the debtor in this case. I am over 18 and have personal knowledge of the facts set above. My address is 7635 Bluebell Ave. N. Hollywood, CA 91605. If called as a witness, I could and would competently testify thereto.

2. I have known Hovanes Tonoyan for several years and know his behavioral patterns.

3. Hovanes has been extremely hurtful and verbally abusive to me.

4. I filed this bankruptcy case to get rid of a debt that I owed to him.

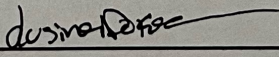
5. Over the last several months he has texted me and called my friends and some family members. He threatens them and tells them that I am a bad person. He uses more vulgar language of course. He wants to tell everyone that knows me of what I allegedly did to him and has made my life very difficult.

6. He has made death threats to me and has continually told me to go kill myself and that I am horrible person. But I am not. The text messages that are attached as **Exhibit B** is a glimpse of the type of harassment we have been subjected to.

7. He emailed my bankruptcy attorney with the same verbally abuse language and he just won't stop.

8. I do not mind turning over my bank statements that are with the Trustee but I beg the Court to please allow me or the Trustee to redact the names in the bank statements. Otherwise, Hovanes is going to Google them and find their contact information on social media and continue his hatred and cruelty.

9. My friends and individuals identified in the bank statements do not deserve that and should be left alone. I ask the Court to please protect their identity from Hovanes finding out their identity.



Lusine Dokuzyan, Declarant

EXHIBIT A

AMY L. GOLDMAN,
Marisol.Jaramillo@lewisbrisbois.com
633 W. 5th Street, Suite 4000
Los Angeles, CA 90071
Telephone: 213.250.1800
Facsimile: 213.250.7900

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA DIVISION
SAN FERNANDO VALLEY DIVISION

In re

Lusine Cristine Dokuzyan,

Debtors.

Case No. 1:22-bk-10283-MB

Chapter 7

**NOTICE OF CHAPTER 7 TRUSTEE'S
INTENTION TO RELEASE
DOCUMENTS**

[11 U.S.C. § 704(a)(7)]

[No Hearing Required]

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that Amy L. Goldman, the Chapter 7 Trustee (the "Trustee") for the estate of Lusine Cristine Dokuzyan (the "Debtor"), intends to release certain account statements of the Debtor to Hovanes John Tonoyan, in accordance with 11 U.S.C. § 704(a)(7), which provides that the Trustee shall: "unless the court orders otherwise, furnish such information concerning the estate and the estate's administration as is requested by a party in interest." Specifically, Hovanes John Tonoyan on behalf of himself, has requested copies of all documents and records produced by the Debtor to the Trustee during the course of the Trustee's investigation of the Debtor's assets and liabilities (the "Documents").

1 **PLEASE TAKE FURTHER NOTICE THAT** the Trustee intends to release the
2 Documents to Hovanes John Tonoyan unless a motion for a protective order is filed within 14
3 days after service of this Notice, and the Bankruptcy Court enters an order prohibiting production
4 of the Documents.

5
6 Dated: June 29, 2022

/s/ Amy L. Goldman
Amy L. Goldman, Chapter 7 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 633 W. 5th Street, Suite 4000, Los Angeles, California 90071

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE DOCUMENTS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **CHAPTER 7 TRUSTEE Amy L Goldman (TR)** marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com
- **DEBTOR ATTORNEY Sevan Gorginian** sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com
- **UNITED STATES TRUSTEE United States Trustee (SV)** ustpregion16.wh.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On June 29, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

Lusine Cristine Dokuzyan
7635 Bluebell Ave.
North Hollywood, CA 91605

☐ Service information continued on attached page

3. OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) June 29, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

CREDITOR Hovanes John Tonoyan - Via Email: hoviktonoyan@gmail.com

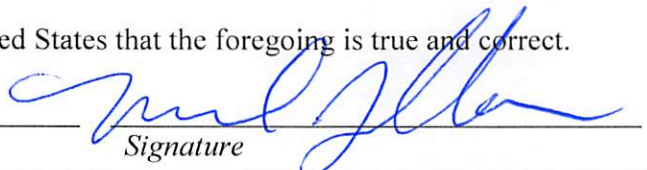
☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 29, 2022
Date

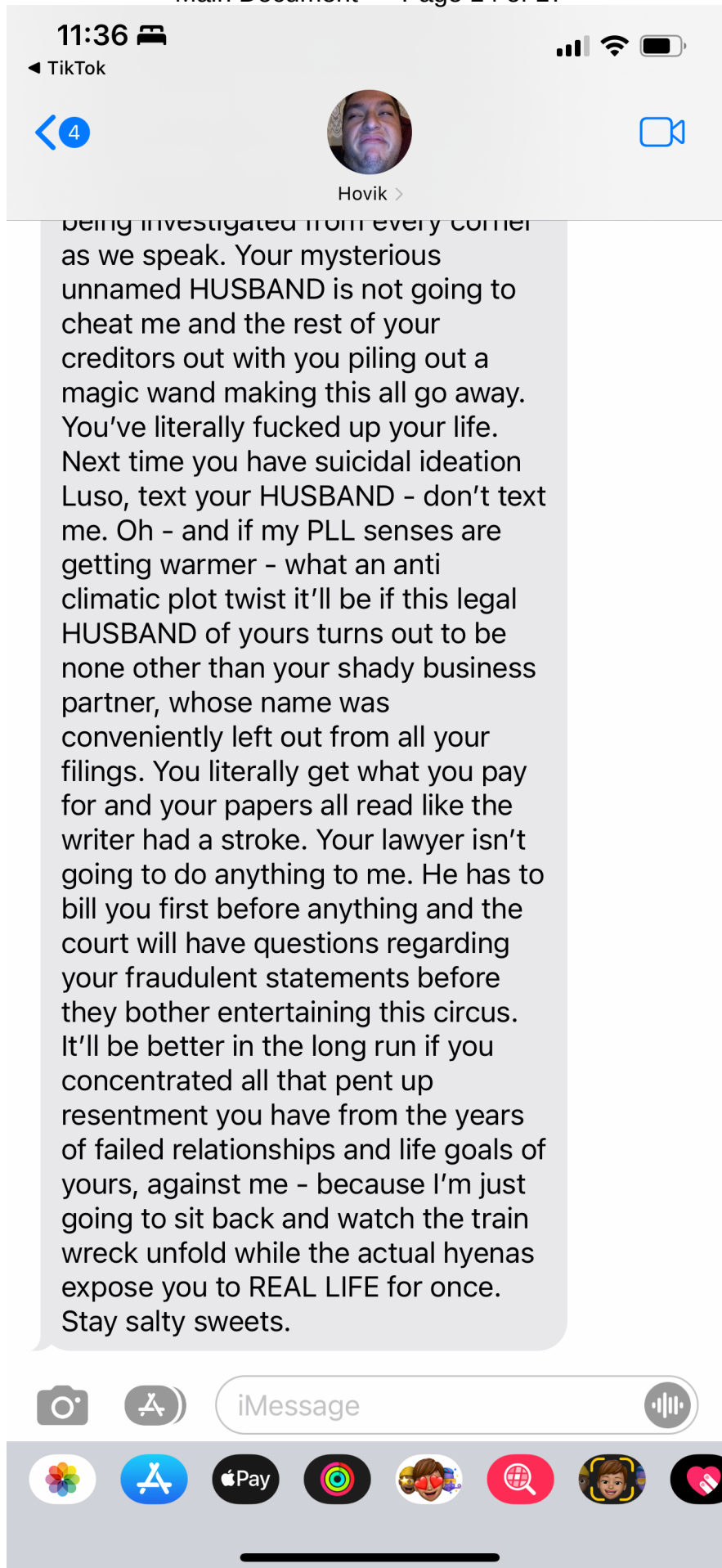
Marisol Jaramillo
Printed Name

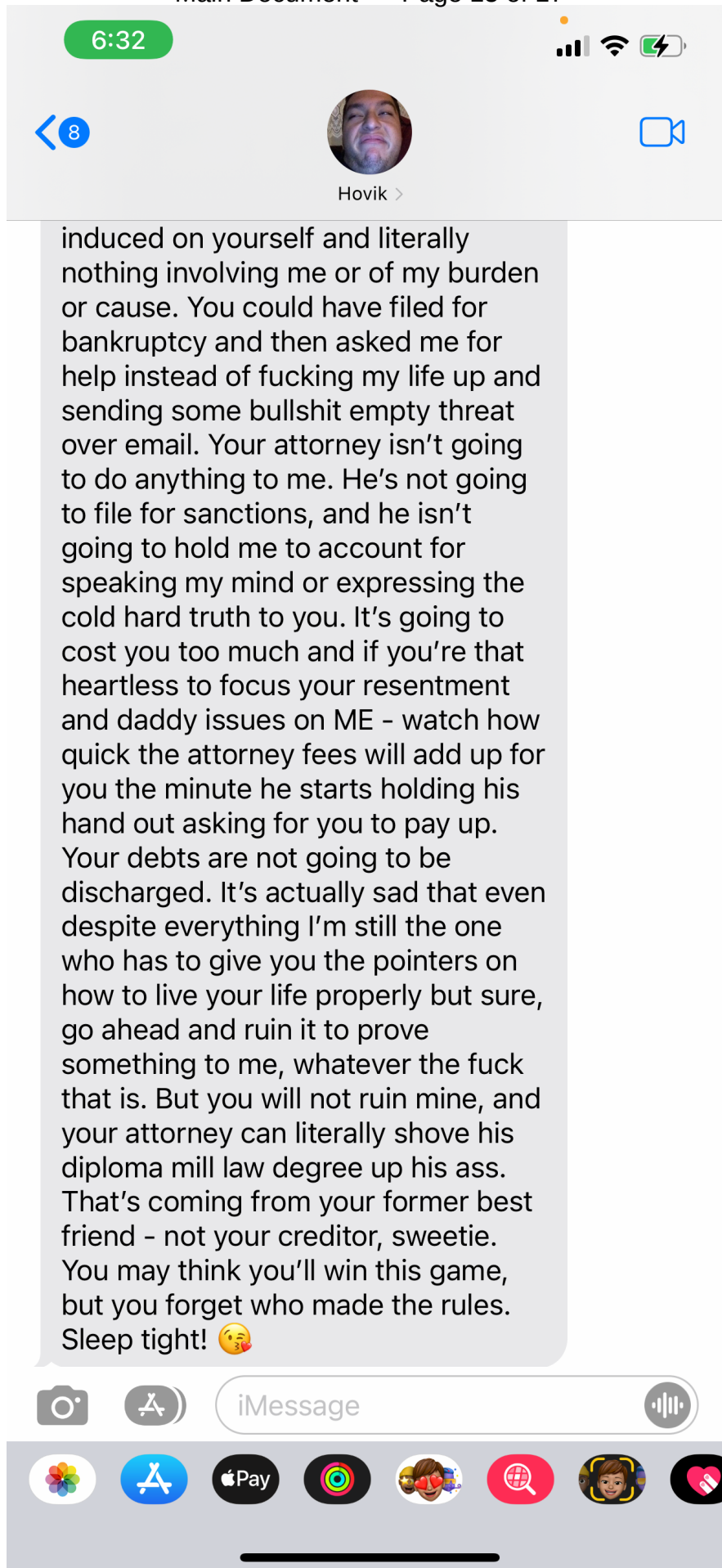
Signature



This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

EXHIBIT B





induced on yourself and literally nothing involving me or of my burden or cause. You could have filed for bankruptcy and then asked me for help instead of fucking my life up and sending some bullshit empty threat over email. Your attorney isn't going to do anything to me. He's not going to file for sanctions, and he isn't going to hold me to account for speaking my mind or expressing the cold hard truth to you. It's going to cost you too much and if you're that heartless to focus your resentment and daddy issues on ME - watch how quick the attorney fees will add up for you the minute he starts holding his hand out asking for you to pay up. Your debts are not going to be discharged. It's actually sad that even despite everything I'm still the one who has to give you the pointers on how to live your life properly but sure, go ahead and ruin it to prove something to me, whatever the fuck that is. But you will not ruin mine, and your attorney can literally shove his diploma mill law degree up his ass. That's coming from your former best friend - not your creditor, sweetie. You may think you'll win this game, but you forget who made the rules. Sleep tight! 🤔

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **450 N. Brand Blvd. Suite 600 Glendale, CA 91203**

A true and correct copy of the foregoing document entitled (*specify*): **DEBTOR'S OPPOSITION AND MOTION FOR PROTECTIVE ORDER RE: CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE DOCUMENTS [DKT. 18]** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **7/11/22**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Amy L Goldman (TR)
marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com; ecf.alert+Goldman@titlexi.com

Sevan Gorginian on behalf of Debtor Lusine Cristine Dokuzyan
sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com; ani@gorginianlaw.com

United States Trustee (SV)
ustpreion16.wh.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On (*date*) July 12, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

PRESIDING JUDGE

Hon. Martin R. Barash
U.S. Bankruptcy Court
21041 Burbank Blvd. Suite 342
Woodland Hills, CA 91367

Creditor (per address on his complaint filed in the adversary case)
HOVANES JOHN TONAYAN
6627 Beeman Avenue
North Hollywood, CA 91606

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 12, 2022

Date

Ani Minasyan

Name

/s/ Ani Minasyan

Signature

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

450 N. Bran Blvd. Suite 600 Glendale, CA 91203

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR** (*specify name of motion*)
Debtor's Opposition and Motion for Protective Order Re: Ch 7 Trustee's Intention to Release Documents

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 07/12/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: Amy L Goldman (TR)marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.c

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 07/12/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Creditor Hovanes Tonoyan (per address on his adversary complaint)
6627 Beeman Avenue, North Hollywood, CA 91606

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

07/12/2022
Date

Sevan Gorginian
Printed Name

/s/ Sevan Gorginian
Signature